

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA**

JASON KESSLER,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil No. 3:18CV00015
CITY OF CHARLOTTESVILLE, VIRGINIA)	
)	
and)	
)	
MAURICE JONES,)	
Charlottesville City Manager)	
)	
Defendants.		

**MOTION FOR A PRELIMINARY INJUNCTION AND/OR TEMPORARY
RESTRAINING ORDER**

Pursuant to Fed. R. Civ. P. 65, Plaintiff, by counsel, respectfully requests that the Court grant him a temporary restraining order or preliminary injunction (1) enjoining Defendants to allow Plaintiff's demonstration to go on as planned in Emancipation Park during normal hours on August 11 and 12, 2018; and 2) enjoining Defendants to provide such security as may be necessary to protect the rights of the demonstrators and the public.

As more fully set forth in Plaintiff's Memorandum in Support, Plaintiff is likely to succeed on the merits of its claims and will suffer irreparable harm in the absence of preliminary relief.

The balance of equities tilts strongly in its favor, and an injunction protecting Plaintiff's constitutional rights is accord with the public interest.

Wherefore a preliminary injunction and or temporary restraining order should issue.

Respectfully submitted,

JASON KESSLER

By Counsel

Dated: June 22, 2018

Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the above was served upon all parties of record via the Court's ECF system on June 22, 2018 and that no one entitled to service has requested or is need of service by other means.

s/ James E. Kolenich PHV
James E. Kolenich